

Exhibit A

Michael W. Stocker (179083)
Reed R. Kathrein (139304)
Kristen McCulloch (177558)
Danielle Smith (291237)
HAGENS BERMAN SOBOL SHAPIRO LLP
715 Hearst Ave., Suite 202
Berkeley, CA 94710
Telephone: (510) 725-3000
Facsimile: (510) 725-3001
mikes@hbsslaw.com
reed@hbsslaw.com
kristenm@hbsslaw.com
danielles@hbsslaw.com

Attorneys for Proposed Lead Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

KALMAN ISAACS, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

ELON MUSK and TESLA, INC.,

Defendants.

Case No. 3:18-cv-04865-EMC

**DECLARATION OF JAMES
JOHNSON IN SUPPORT OF
MEMORANDUM OF LAW IN
FURTHER SUPPORT OF MOTION
OF JAMES JOHNSON FOR
APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF
HIS SELECTION OF LEAD
COUNSEL; AND IN OPPOSITION
TO COMPETING MOTIONS**

Date: November 15, 2018
Time: 1:30 p.m.
Courtroom: 5, 17th Floor
Judge: Hon. Edward M. Chen

ORAL ARGUMENT REQUESTED

WILLIAM CHAMBERLAIN, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

TESLA, INC. and ELON MUSK,

Case No. 3:18-cv-04876-EMC

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Defendants.
JOHN YEAGER, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. TESLA, INC. and ELON MUSK, Defendants.
CARLOS MAIA, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. TESLA, INC. and ELON R. MUSK, Defendants.
KEWAL DUA, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. TESLA, INC. and ELON MUSK, Defendants.
JOSHUA HORWITZ, Individually and on Behalf of All Others Similarly Situated, Plaintiff, v. TESLA, INC. and ELON R. MUSK Defendants.

Case No.3:18-cv-04912-EMC

Case No. 3:18-cv-04939-EMC

Case No. 3:18-cv-04948-EMC

Case No. 3:18-cv-05258-EMC

1 ANDREW E. LEFT, Individually and on Behalf
2 of All Others Similarly Situated,

3 Plaintiff,

4 v.

5 TESLA, INC. and ELON R. MUSK,

6 Defendants.

Case No. 3:18-cv-05463-EMC

7 ZHI XING FAN, Individually and on Behalf of
8 All Others Similarly Situated,

9 Plaintiff,

10 v.

11 TESLA, INC. and ELON R. MUSK,

12 Defendants.

Case No. 3:18-cv-05470-EMC

13 SHAHRAM SODEIFI, Individually and on
14 Behalf of All Others Similarly Situated,

15 Plaintiff,

16 v.

17 TESLA, INC., a Delaware corporation, and
18 ELON R. MUSK, an individual,

19 Defendants.

Case No. 3:18-cv-05899-EMC

1 **I, JAMES JOHNSON**, declare the following under the penalties of perjury:

2 1. I respectfully submit this Declaration in support of the memorandum of law in further
3 support of the motion for the appointment of me, James Johnson, as lead plaintiff, and approval of
4 my selection of lead counsel and in opposition to competing motions. I have personal knowledge
5 regarding the information in this Declaration.

6 2. I have only purchased Tesla, Inc. common stock for a long-term position.

7 3. I have never shorted Tesla, Inc. common stock.

8 4. I have never bought or sold Tesla put or call options.

9 5. Prior to August 7, 2018 (i.e., the beginning of the class period), I did not have a
10 current position in Tesla common stock, or any other Tesla securities. My purchases of Tesla, Inc.
11 common stock during the class period were new purchases based on the public Twitter messages of
12 Elon Musk.

13 6. A true and correct copy of my resume was previously attached as Exhibit A to the
14 Declaration of Reed R. Kathrein In Support Of Memorandum Of Law In Further Support Of Motion
15 Of James Johnson For Appointment As Lead Plaintiff, And Approval Of His Selection Of Lead
16 Counsel; And In Opposition To Competing Motions (ECF No. 114-1).

17 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United
18 States of America that the foregoing statements are true to the best of my knowledge.

19 Executed in Irvine, CA this 30th day of October, 2018.

20 DocuSigned by:
21 *James Johnson*
22 709673A8A17D405...
James Johnson